



www.pbwt.com

February 17, 2023

By ECF

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 2/17/2023

Harry Sandick
Partner
(212) 336-2723
(212) 336-1215 Direct Fax
hsandick@pbwt.com

The Honorable Nelson S. Román
The Hon. Charles L. Briant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: United States v. Jacqueline Graham, No. 16-cr-00786 (NSR)

Dear Judge Román:

We represent Jacqueline Graham with respect to her direct appeal of her conviction and her renewed request for a reduction in sentence, or in the alternative for a modification to home detention, based on extraordinary and compelling reasons pursuant to 18 U.S.C. § 3582.

Ms. Graham filed her pending motion on January 31, 2023 (ECF No. 371) and the government submitted its response on February 16, 2023 (ECF No. 373), as directed by the Court. We respectfully request leave to file a reply brief, not longer than three pages, to be submitted on or before February 23, 2023. The government consents to this request for leave to file a reply brief.

We thank the Court for its consideration of this application.

Respectfully submitted,

/s/ Harry Sandick

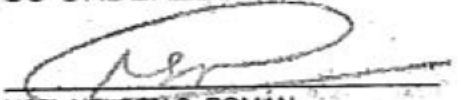
Harry Sandick

cc: All counsel of record via ECF

The Court GRANTS Ms. Graham's request to submit a response on or before February 23, 2023, no longer than three pages.

Dated: February 17, 2023
White Plains, NY

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

MEMO ENDORSED